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EX PARTE OR LATE FILED

July 18, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Presentation**
Numbering Resource Optimization, CC Docket No. 99-200

Dear Ms. Salas:

On July 17, 2000 Fred Goodwin, Jim Smith, Gilbert Orozco, William Adair and Hope Thurott of SBC Communications, Inc. met with Yog Varma, Deputy Chief, Common Carrier Bureau and Aaron Goldberger, Les Selzer, and Josephine Simmons of the FCC. The purposed of the meeting was to discuss issues associated with number pooling cost recovery raised in the Commission's March 31, 2000 Report and Order in the above referenced docket. The attached presentation guided the discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Goodwin". The signature is written in a cursive, flowing style.

Attachment

CC: Aaron Goldberger
Josephine Simmons

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List A B C D E

Number Pooling Cost Recovery

Number Pooling Costs are Incremental to LNP Costs

- Significant changes are necessary to support number pooling
- The costs associated with these changes are estimated to be \$221.3M
- Updated vendor costs and more specific implementation requirements have allowed SBC to refine its estimated costs for deploying number pooling
- SBC is currently incurring costs to modify its network and operational support systems to support national pooling

Network Changes Required to Support Number Pooling

- 1,453 central office upgrades to handle vacant pooled numbers correctly
 - Does not include 1AESSs
- STP and LSMS modifications and testing are planned
 - Enhancements to support Efficient Data Representation (EDR)
- NPAC release 3.0 installation and testing underway
- Network modifications are additional costs required to implement national number pooling

System Changes Required to Support Number Pooling

- Service order provisioning modifications required
 - To support K-block block donations and receipt
 - To support service order processing and assignment of pooled blocks
- Billing modifications to change billing logic from NPA-NXX format to NPA-NXX-X format
 - Necessary to distinguish SBC K-blocks from other service provider K-blocks and service types (expanded calling plans, etc.)
- Service assurance system modifications i.e., repair to support the new NPA-NXX-X format

Current LNP Surcharge Should Be Adjusted to Recover Pooling Costs

- SBC supports adjusting the current end user LNP surcharge at the time national pooling begins
 - Some state commissions and service providers support this approach
- Current estimates would only increase the current LNP end user charge by 8 to 10 cents a month
 - Increase will begin with national rollout - current view is that national pooling begins early 3Q2001
 - Rate adjustment would only apply for the remaining period of the current end user charge (year end 2004)

Pooling Impact on Area Code Exhaust is Speculative

- Number pooling will not eliminate the need or in some cases significantly delay the need for area code relief
 - In SBC's region there are currently 98 area codes
 - 25 of these are currently in jeopardy
 - Non-LNP providers still require full codes
 - Only experience with pooling impact is with 847 in Chicago
Area code relief is being delayed by only 2 years (4Q00 Vs. 3Q98)
 - Other factors played a role in extending the 847 area code

Projected Area Code Exhaust in SBC's Region

- Data based on NANPA's projections of May 2000

<u>Year</u>	<u># of NPAs</u>
2000	3
2001	13
2002	19
2003	12
2004	15
2005+	36

- 17 of the 2005+ NPAs are outside of the top 100 MSAs.
- 25 of the NPAs are in rationing

Status of State Number Pooling Trials

Pooling trials have been ordered in the following states in SBC's region:

<u>State</u>	<u>Area Code</u>	<u>Pooling Date</u>
Illinois	847	June 1, 1998
	630	August 16, 1999
	312	August 30, 1999
	773	October 1, 1999
	708	April 3, 2000
California*	310	March 18, 2000
	415	July 29, 2000
	714	October 6, 2000
	909	December 8, 2000
Texas	512	August 1, 2000
Connecticut	806	October 1, 2000

* 13 additional trials are being considered throughout 2001